

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ABRAHAM KLEINMAN,

Plaintiff,

v.

ROC CAPITAL HOLDINGS LLC,  
CHAIM PORGES, and HELENA  
PORGES,

Defendants.

Case No. 1:22-cv-2566-ALC

DECLARATION IN SUPPORT OF  
REQUEST FOR CERTIFICATE OF  
DEFAULT AS TO DEFENDANT ROC  
CAPITAL HOLDINGS LLC

MOSHE BOROOSAN hereby declares the following under penalty of perjury:

1. I am the principal attorney at the Law Offices of Moshe Boroosan, P.C., counsel to plaintiff Abraham Kleinman in the above-referenced action. I make this declaration in support of Plaintiff's request for a certificate of default against defendant Roc Capital Holdings LLC ("Roc Capital").

3. On March 29, 2022, Plaintiff filed a complaint against defendants Chaim Porges, Helena Porges, and Roc Capital. ECF No. 1.

4. A summons was issued as to defendant Roc Capital on March 30, 2022. ECF No. 7.

5. Plaintiff caused defendant Roc Capital to be served on April 4, 2022. A proof of service was filed electronically on April 4, 2022. ECF No. 10.

6. Defendant Roc Capital was required to answer or otherwise respond to the complaint within 21 days, or by April 25, 2022. That time has not been extended.

7. Defendant Roc Capital has failed to appear, plead or otherwise respond to the complaint within the time allowed by law, and is now in default.

8. Defendant Roc Capital is not an infant or incompetent person, and is not presently in the military service of the United States.

WHEREFORE, Plaintiff requests that the default of defendants Roc Capital be noted and a certificate of default issued. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief, that the amount claimed is justly due Plaintiff and that no part thereof has been paid.

DATED: April 26, 2022

**LAW OFFICES OF MOSHE BOROOSAN, P.C.**

*/s/ Moshe O. Boroosan*

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